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The Honorable James L. Robart
Date for consideration: March 2, 2006

UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF WASHINGTON, AT SEATTLE

MARK MARING, et al.,

 Plaintiffs,
 vs.
 PG ALASKA CRAB INVESTMENT CO. LLC,
 et al.,
 Defendants.

CASE NUMBER: CV05-0326JLR

STIPULATION, MOTION AND
 PROPOSED ORDER REGARDING
 AMENDMENT OF CASE
 SCHEDULING ORDER

PG ALASKA CRAB INVESTMENT CO. LLC,
 et al.,

 Counterclaim Plaintiffs,
 vs.
 MARK MARING, et al.,

 Counterclaim Defendants.

NOTE ON MOTION CALENDAR:
 March 2, 2006

STIPULATION

Plaintiffs Maring et. al. and Defendants PG Alaska Crab Investment Co., LLC et. al., through their counsel of record, stipulate to adjust the case schedule as outlined herein. The parties' originally agreed to extend certain dates for discovery and discovery motion in consideration of the fact that an

**STIPULATION AND ORDER ADJUSTING
 CASE SCHEDULE - 1**

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1 immediate family member of one of plaintiffs' attorneys was experiencing serious health issues. The
 2 Court, however, denied the parties' stipulated motion to extend the discovery deadline and discovery
 3 motion cut-off because the parties failed to address the other dates of the case schedule, most notably
 4 the deadline for filing dispositive motions.

5 The parties have now conferred and move the Court to adopt the following case schedule.
 6
 7 Good cause exists for this request to continue dates as the continuance will allow plaintiffs' counsel
 8 to attend to family matters associated with the death of an immediate family member, provides
 9 adequate time for discovery, and cures the parties' inadvertent failure to provide for a dispositive
 10 motion deadline near the close of discovery but at least 90 days prior to trial. The proposed schedule
 11 is as follows:

13	Trial Date:	July 24, 2006
14	Close of Discovery	April 3, 2006 ¹
15	Deadline for Discovery Motions:	April 21, 2006
16	Deadline for Dispositive Motions:	April 24, 2006
17	Deadline for filing Motions in Limine:	June 26, 2006
18	Agreed Pretrial Order:	July 10, 2006
19	Pretrial Conference:	_____

21 //

22 _____
 23 ¹ As with the parties' stipulation of February 27, 2006, the agreement to extend the discovery cut-off to April 3, 2006 is not
 24 intended to allow for open-ended discovery. Rather, the extended period of discovery is agreed to allow the parties to
 25 complete discovery that was commenced or discussed prior to the close of the existing discovery deadline—March 3, 2006—
 which discovery was postponed in consideration of plaintiffs' counsel's family emergency. Defendants' dispute the efficacy
 or appropriateness of some discovery requests made by plaintiffs near the presently existing "close of discovery" and

**Trial Briefs, proposed vior dire,
Jury instructions, trial exhibits:**

July 10, 2006

The foregoing schedule does not set a date for the exchange of expert witness reports. Defendants take the position that the deadline for such exchange was the date listed for disclosure of expert testimony in the parties' December 22, 2006 stipulation, which has already passed, and plaintiffs are therefore precluded from submitting an expert witness report. Plaintiffs take the position that the parties' were obligated to identify expert witnesses and generally outline their intended testimony by the disclosure date but that expert witness reports would be exchanged approximately 90 days prior to trial pursuant to Fed.R.Civ.P. 26(a)(2)(C). Plaintiffs anticipate presenting this issue to the judge for resolution in the near future.

Stipulated to this 2nd day of March 2006.

BUCKNELL STEHLIK SATO & STUBNER LLP

/s/ Andrea D. Orth

Thomas N. Bucknell, WSBA No. 1587

Andrea Orth, WSBA No. 24355

Attorneys for Plaintiffs

DORSEY & WHITNEY

/s/ Andrea D. Orth for Alex Baehr

per telephonic authorization

Alexander A. Baehr, WSBA No. 25320

Attorneys for defendants

plaintiffs intend to raise this issue for court resolution in the near future.

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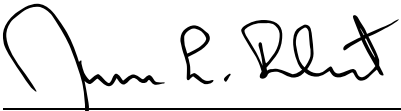
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**STIPULATION AND ORDER ADJUSTING
CASE SCHEDULE - 3**

ORDER

Pursuant to Local Rule CR 10(g), the subjoined stipulation and motion to amend the case schedule is GRANTED; the case schedule is deemed amended as outlined above.

Entered this 7th day of March 2006.


JAMES L. ROBART
United States District Judge

Presented by:

BUCKNELL STEHLIK SATO & STUBNER LLP

/s/ Andrea D. Orth
Thomas N. Bucknell, WSBA No. 1587
Andrea D. Orth, WSBA No. 24355
Attorneys for Plaintiffs

**STIPULATION AND ORDER ADJUSTING
CASE SCHEDULE - 4**

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